

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

MARC VEASEY, *et al.*,

Plaintiffs,

v.

RICK PERRY, *et al.*,

Defendants.

Civil Action No. 2:13-cv-193 (lead)
(consolidated w/ 2:13-cv-263)

**VEASEY-LULAC PLAINTIFFS' UNOPPOSED MOTION FOR LEAVE TO FILE
SECOND AMENDED COMPLAINT**

Plaintiffs Marc Veasey, Jane Hamilton, Sergio DeLeon, Floyd J. Carrier, Anna Burns, Michael Montez, Penny Pope, Oscar Ortiz, Koby Ozias, John Mellor-Crummey, Peggy Draper Herman, Evelyn Brickner, Gordon Benjamin, Ken Gandy, League of United Latin American Citizens ("LULAC") and Dallas County, Texas (hereafter, the "Veasey-LULAC Plaintiffs") respectfully submit this unopposed motion for leave to file a second amended complaint. The Veasey-LULAC Plaintiffs do not believe leave is required, but Defendants have said they think it is, so Plaintiffs are doing so to resolve this issue without further debate. Defendants have indicated that they do not oppose this motion.¹

WHEREFORE, the Veasey-LULAC Plaintiffs respectfully pray that this Court grant this unopposed motion. A proposed Order is attached.

¹ If the Court grants this motion, no further action is required, because Plaintiffs have already filed their second Amended Complaint (ECF No. 109), Defendants have already moved to dismiss it (ECF No. 130), Plaintiffs are today filing their Opposition to the motion to dismiss, and Defendants will then have the opportunity to file their Reply in support of their motion to dismiss.

Respectfully submitted,

BRAZIL & DUNN

/s/ Chad W. Dunn

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CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of January, 2014, I served a copy of the foregoing on all counsel of record by filing a copy of the same in this Court's ECF system.

/s/ Chad W. Dunn
Chad W. Dunn

